

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Case No. 18-cv-1776 (JRT/JFD)

This Document Relates to:

All Class Actions

**JOINT STIPULATION TO CONTINUE DEADLINES
FOR JOINT MOTIONS REGARDING CONTINUED SEALING**

Counsel for the undersigned Defendants;¹ Direct Purchaser Plaintiffs (“DPPs”), Commercial and Institutional Indirect Purchaser Plaintiffs (“CIIPPs”), and Consumer Indirect Purchaser Plaintiffs (“IPPs”) (together, “Class Plaintiffs”) (collectively, the “Parties”) in the above-captioned consolidated action stipulate and hereby jointly request, pursuant to Federal Rules of Civil Procedure 16(b)(5) and D. Minn. Local Rule 16.3, that the Court continue the existing deadlines, as set by D. Minn. Local Rule 5.6(d)(2) (“L.R. 5.6”), for the joint motions regarding continued sealing concerning Class Plaintiffs’ motions for class certification, as set forth in this stipulation.

¹ Agri Stats, Inc.; Clemens Food Group, LLC, Clemens Family Corp., and Hatfield Quality Meats; Hormel Foods Corp., and Hormel Foods, LLC; Seaboard Foods LLC; Triumph Foods, LLC; and Tyson Foods, Inc., Tyson Fresh Meats, Inc. and Tyson Prepared Foods, Inc.

The Parties agree that good cause exists to continue the standard deadline set by L.R. 5.6 (i.e., 21 days after the filing of the final memorandum authorize) given the length of the Parties' briefs and number of filings filed under seal by the Parties.²

Event	Current Deadline	Proposed Deadline
DPPs and Defendants' Joint Motion Regarding Continued Sealing, including redacted versions of Defendants' omnibus and DPP briefs opposing class certification	December 9, 2022	January 27, 2023
CIIPPs and Defendants' Joint Motion Regarding Continued Sealing, including the redacted version of Defendants' CIIPP brief opposing to class certification	December 9, 2022	January 27, 2023
IPPs and Defendants' Joint Motion Regarding Continued Sealing, including redacted versions of IPPs' brief ISO motion for class certification, Defendants' IPP brief opposing class certification, and IPPs' reply ISO class certification	December 9, 2022	January 27, 2023
Defendants and DPPs' Joint Motion Regarding Continued Sealing, including the redacted version of Defendants' brief ISO motion to exclude the report and testimony of Dr. Mangum and Defendants' reply brief	January 27, 2023	January 27, 2023 (no change)

² In total, the Parties filed 578 exhibits under seal regarding class certification: DPPs filed 119 exhibits under seal, CIIPPs filed 73 exhibits under seal, IPPs filed 282 exhibits under seal, and Defendants filed 104 exhibits under seal. In addition, IPPs and Defendants plan to file redacted versions of their respective briefs.

Defendants and CIIPPs' Joint Motion Regarding Continued Sealing, including the redacted version of Defendants' brief ISO motion to exclude the report and testimony of Dr. Williams and Defendants' reply brief	January 27, 2023	January 27, 2023 (no change)
Defendants and IPPs' Joint Motion Regarding Continued Sealing, including redacted versions of Defendants' brief ISO motion to exclude the report and testimony of Dr. Singer, IPPs' brief opposing the motion, and Defendants' reply	January 27, 2023	January 27, 2023 (no change)

The proposed deadline of January 27, 2023 is the deadline, as set by L.R. 5.6, for the joint motions regarding continued sealing concerning Defendants' motions to exclude the reports and testimony of Drs. Mangum, Williams, and Singer (i.e., 21 days after January 6, 2023).

Dated: December 7, 2022

Respectfully submitted,

/s/ Jarod Taylor

Jarod Taylor (*pro hac vice*)
AXINN, VELTROP & HARKRIDER
LLP
90 State House Square
Hartford, CT 06103
(860) 275-8109
jtaylor@axinn.com

Rachel J. Adcox (*pro hac vice*)
Tiffany Rider Rohrbaugh (*pro hac vice*)
Kenina J. Lee (*pro hac vice*)
Lindsey Strang Aberg (*pro hac vice*)
Brandon Boxbaum (*pro hac vice*)
Allison Vissichelli (*pro hac vice*)
Keith Holleran (*pro hac vice*)

AXINN, VELTROP & HARKRIDER
LLP

1901 L Street NW
Washington, DC 20036
(202) 912-4700
radcox@axinn.com
trider@axinn.com
klee@axinn.com
lstrang@axinn.com
bboxbaum@axinn.com
avissichelli@axinn.com
kholleran@axinn.com

Craig M. Reiser (*pro hac vice*)
Kail Jethmalani (*pro hac vice*)
Andrea N. Rivers (*pro hac vice*)
Victoria J. Lu (*pro hac vice*)
AXINN, VELTROP & HARKRIDER
LLP

114 West 47th Street
New York, NY 10036
(212) 728-2200
creiser@axinn.com
kjethmalani@axinn.com
arivers@axinn.com
vlu@axinn.com

David P. Graham (#0185462)
DYKEMA GOSSETT PLLC
4000 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
(612) 486-1521
dgraham@dykema.com

***Counsel for Tyson Foods, Inc., Tyson
Prepared Foods, Inc. and Tyson Fresh
Meats, Inc.***

/s/ Peter H. Walsh

Peter H. Walsh (#0388672)
HOGAN LOVELLS US LLP
80 South Eighth Street, Suite 1225

/s/ Mark L. Johnson

Mark L. Johnson (#0345520)
Davida S. McGhee (#0400175)
GREENE ESPEL PLLP

Minneapolis, MN 55402
(612) 402-3000
peter.walsh@hoganlovells.com

William L. Monts (*pro hac vice*)
Justin W. Bernick (*pro hac vice*)
HOGAN LOVELLS US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, D.C. 20004
(202) 637-5600
william.monts@hoganlovells.com
justin.bernick@hoganlovells.com

Counsel for Agri Stats, Inc.

/s/ Christopher A. Smith
Aaron Chapin (#0386606)
Christopher A. Smith (*pro hac vice*)
Tessa K. Jacob (*pro hac vice*)
A. James Spung (*pro hac vice*)
Jason Husgen (*pro hac vice*)
Sarah L. Zimmerman (MDL registered)
Kate Ledden (MDL registered)
Tanner Cook (MDL registered)
HUSCH BLACKWELL LLP
190 Carondelet Plaza, Ste 600
St. Louis, MO 63105
Telephone: (314) 480-1500
aaron.chapin@huschblackwell.com
chris.smith@huschblackwell.com
tessa.jacob@huschblackwell.com
james.spung@huschblackwell.com
jason.husgen@huschblackwell.com
sarah.zimmerman@huschblackwell.com
kate.ledden@huschblackwell.com
tanner.cook@huschblackwell.com

Counsel for Triumph Foods, LLC

222 South Ninth Street, Suite 2200
Minneapolis, MN 55402
(612) 373-0830
mjohnson@greeneespel.com
dwilliams@greeneespel.com

Daniel Laytin, P.C. (*pro hac vice*)
Christa Cottrell, P.C. (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 861-2000
daniel.laytin@kirkland.com
christa.cottrell@kirkland.com

***Counsel for Clemens Food Group, LLC
and The Clemens Family Corporation***

/s/ William L. Greene
William L. Greene (#0198730)
Peter J. Schwingler (#0388909)
William D. Thomson (#0396743)
STINSON LLP
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402
(612) 335-1500
william.greene@stinson.com
peter.schwingler@stinson.com
william.thomson@stinson.com

J. Nicci Warr (*pro hac vice*)
STINSON LLP
7700 Forsyth Blvd., Suite 1100
St. Louis, MO 63105
(314) 863-0800
nicci.warr@stinson.com

***Counsel for Seaboard Foods LLC and
Seaboard Corporation***

/s/ Craig S. Coleman

Craig S. Coleman (#0325491)
Richard A. Duncan (#0192983)
Aaron D. Van Oort (#0315539)
Emily E. Chow (#0388239)
Isaac B. Hall (#0395398)
FAEGRE DRINKER BIDDLE & REATH
LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
(612) 766-7000
richard.duncan@faegredrinker.com
aaron.vanoort@faegredrinker.com
craig.coleman@faegredrinker.com
emily.chow@faegredrinker.com
isaac.hall@faegredrinker.com

Jacob D. Bylund (*pro hac vice*)
Stephanie A. Koltookian (*pro hac vice*)
Robert C. Gallup (#0399100)
FAEGRE DRINKER BIDDLE &
REATH LLP
801 Grand Ave., 33rd Floor
Des Moines, IA 50309
(515) 248-9000
jacob.bylund@faegredrinker.com
stephanie.koltookian@faegredrinker.com
robert.gallup@faegredrinker.com

Jonathan H. Todt (*pro hac vice*)
FAEGRE DRINKER BIDDLE & REATH
LLP
1500 K Street NW, Suite 1100
Washington, DC 20005
(202) 842-8800
jonathan.todt@faegredrinker.com

John S. Yi (*pro hac vice*)
FAEGRE DRINKER BIDDLE & REATH
LLP
One Logan Square, Suite 2200

/s/ Joseph C. Bourne

Joseph C. Bourne (MN #0389922)
W. Joseph Bruckner (MN #0147758)
Brian D. Clark (MN #0390069)
Arielle S. Wagner (MN #0398332)
Stephen M. Owen (MN # 0399370)
LOCKRIDGE GRINDAL NAUEN
P.L.L.P.
100 Washington Avenue South, Suite
2200
Minneapolis, MN 55401
T: (612) 339-6900
jcbourne@locklaw.com
wjbruckner@locklaw.com
bdclark@locklaw.com
aswagner@locklaw.com
smowen@locklaw.com

/s/ Bobby Pouya

Bobby Pouya
Clifford H. Pearson
Daniel L. Warshaw
Michael H. Pearson
PEARSON SIMON & WARSHAW, LLP
15165 Ventura Boulevard, Suite 400
Sherman Oaks, CA 92403
T: (818) 788-8300
cpearson@pswlaw.com
dwarshaw@pswlaw.com
bpouya@pswlaw.com
mpearson@pswlaw.com

Melissa S. Weiner (MN #0387900)
PEARSON, SIMON & WARSHAW, LLP
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
T: (612) 389-0600
mweiner@pswlaw.com

Bruce L. Simon
Benjamin E. Shiftan
Neil Swartzberg
PEARSON, SIMON & WARSHAW, LLP

Philadelphia, PA 19103
(215) 988-2700
john.yi@faegredrinker.com

Counsel for Hormel Foods Corporation

/s/ Shawn M. Raiter
Shawn M. Raiter (MN# 240424)
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
T: (651) 312-6518
sraiter@larsonking.com

/s/ Blaine Finley
Blaine Finley
Jonathan W. Cuneo
Joel Davidow
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Avenue NW, Suite 200
Washington, DC 20016
T: (202) 789-3960
bfinley@cuneolaw.com
jonc@cuneolaw.com
joel@cuneolaw.com

Co-Lead Counsel for Commercial and Institutional Indirect Purchaser Plaintiffs

350 Sansome Street, Suite 680
San Francisco, CA 94104
T: (415) 433-9000
F: (415) 433-9008
bsimon@pswlaw.com
bshiftan@pswlaw.com
nswartzberg@pswlaw.com

Co-Lead Class Counsel for Direct Purchaser Plaintiffs

/s/ Shana E. Scarlett
Shana E. Scarlett
Rio Pierce
HAGENS BERMAN SOBOL SHAPIRO
LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
shanas@hbsslaw.com
riop@hbsslaw.com

Steve W. Berman
Breanna Van Engelen
HAGENS BERMAN SOBOL SHAPIRO
LLP
1301 Second Avenue, Suite 2000
Seattle, Washington 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
breannav@hbsslaw.com

Elaine T. Byszewski
HAGENS BERMAN SOBOL SHAPIRO
LLP
301 N. Lake Ave., Suite 920
Pasadena, CA 91101
Telephone: (213) 330-7150
elaine@hbsslaw.com

Daniel E. Gustafson (#202241)

Daniel C. Hedlund (#258337)
Michelle J. Looby (#388166)
Joshua J. Rissman (#391500)
GUSTAFSON GLUEK PLLC
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
jrissman@gustafsongluek.com

***Counsel for Consumer Indirect
Purchaser Plaintiffs***